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June 22, 2018

Via Delafile

Ms. Donna Nickerson, Secretary
Delaware Public Service Commission
Cannon Building, Suite 100
861 Silver Lake Boulevard
Dover, DE 19904

Re: PSC Docket No. 14-193 – Arrearage Management Plan Compliance Filing

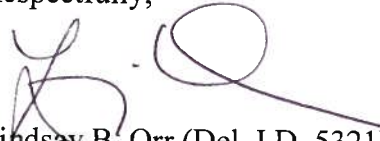
Dear Secretary Nickerson,

Pursuant to the requirements of ordering Paragraph No. 1 of Order No. 9198 in Docket No. 14-193 and Paragraph 21 of Delmarva Power & Light Company's Application for Approval of a Pilot Arrearage Management Program Pursuant to the Provisions of Paragraph 7 of Exhibit "A" to Order No. 8952, filed August 31, 2017 in the same docket, enclosed please find the following:

- Attachment A: Delmarva Power & Light Company's Draft Customer Education Plan for the AMP
- Attachment B: Draft revisions to Delmarva Power & Light Company's Electric Tariff necessary to implement the AMP Pilot.
- Attachment C: Draft revisions to Delmarva Power & Light Company's Gas Tariff necessary to implement the AMP Pilot.

Should you have any questions, please feel free to contact me at the number referenced above or Heather Hall at (302) 451-5323.

Respectfully,

A handwritten signature in dark ink, appearing to be 'L. Orr', with a long horizontal flourish extending to the right.

Lindsay B. Orr (Del. I.D. 5321)

Enclosure

Attachment A

AMP Pilot

Customer Education and Communications Plan

Situation Overview

Delmarva Power is committed to providing affordable energy service to its customers. Delmarva Power filed its Arrearage Management Program (AMP) application with the Delaware Public Service Commission (DE PSC) in August 2017. The AMP Pilot, which was developed with a Working Group of community partners, helps low-income customers in Delaware within Delmarva Power's service area to reduce or eliminate unpaid account balances. When a customer makes timely payments on their current bills during their enrollment in the 12-month program, Delmarva Power provides them with credits every month toward their unpaid account balance. The DE PSC approved the pilot program on March 27, 2018.

The pilot program is part of the company's settlement commitments from the Exelon and Pepco Holdings merger. Section F (Communications and Outreach) of Delmarva Power's program application to the DE PSC outlines proposed customer communications for the program. Section H describes Delmarva Power's requirements to submit drafts of customer education materials to the DE PSC by June 27, 2018.

Purpose / Objective

This document provides an overview of the communications tactics and materials Delmarva Power will consider using to make customers aware of the program and communicate with customers who enroll in the program. The specific goals of this plan are to:

1. Recruit and enroll low-income customers in the AMP Pilot.
2. Fulfill pilot program's communication requirements as laid out in Sections F and H of Delmarva Power's program application.

Key Audiences

The below audiences play important roles in the program's success and could be reached using one or more of the communications tactics laid out in the plan.

1. Delmarva Power's low-income customers in Delaware
2. Delaware community partners and state agencies
3. Delaware Public Service Commission Staff
4. Delaware Public Advocate
5. Elected and appointed officials

Strategies

1. Provide communications materials so customers can understand benefits of the program.
2. Leverage nonprofit and broad stakeholder network to reach low-income customers who may be eligible for the program.

Key Messages

The messages included in this plan would serve as the foundation for all content included in the program's communication materials, including letters, news releases, brochures, fact sheets, social media posts, website content or other communications channels.

1. **Delmarva Power is committed to helping all customers access safe, reliable, and affordable energy service.**

- We are committed to ensuring all our customers have the ability to heat and cool their home, that's why we offer budget billing, flexible payment arrangements, and payment plans to help customers who may be struggling meet their energy needs.
- We also work with our state, federal, and nonprofit partners to connect our customers with grants and programs like LIHEAP, the Low-Income Home Energy Assistance Program, to provide additional support.
- We also provide our customers with tools and resources to manage their energy more efficiently through My Account. My Account contains tools and detailed energy usage information that allows customers to track energy use, compare usage trends, and discover the results of energy-saving practices.

2. Delmarva Power's Arrearage Management Program Pilot helps residential customers in Delaware reduce or eliminate unpaid account balances.

- Customers will receive credits to reduce their past due balance every month for a single year if they make timely payments on their current bills during their enrollment in the 12-month program.
- Customers can receive up to \$6,000 toward their unpaid account balances.
- Credits from Delmarva Power help customers reduce or eliminate outstanding account balances.
- The AMP Pilot is one of the many benefits for low-income customers in Delaware that was funded by the Exelon merger.

3. The new program helps qualifying customers manage account balances by providing a new payment scheduling and budgeting option.

- The AMP Pilot participants are enrolled in Budget Billing, which automatically sets their monthly cost at a flat amount that won't fluctuate based on seasonal energy usage.
- This makes bill paying easier by eliminating uncertainty about monthly costs for energy use.
- Once enrolled in the AMP Pilot and the Budget Billing system, customers make a single energy payment per month, on a regular schedule.
- Following the 12-month program, there is also a three-month catch up period that allows customers to catch up on missed payments.

4. The AMP Pilot is available for qualified residential customers in Delaware.

- To be eligible to participate in the AMP Pilot, a customer must be a residential Delmarva Power customer and have a minimum balance of \$500 past due.
- To be eligible, a customer must earn at or below 60 percent of the Delaware State median income. We have partnered with various state agencies and non-profit organizations who can work with customers to help them determine whether they qualify for the program based on income. Visit the program website to find a community partner.
- Both gas and electric customers are eligible for the program. If a customer has both services through Delmarva Power, credits will be applied to their combined balance.
- A customer who has been disconnected for more than 30 days due to nonpayment is not eligible for the program.
- Customers with active medical certifications on file with Delmarva Power are not eligible for the program.

5. Our community partners will help make enrollment in the AMP Pilot easy.

- Customers can start by finding a community partner that can assist them with determining if they are eligible for the program. Visit the program website to find a helpful community partner.
- Our community partners are the initial points of contact for the program, helping customers evaluate their energy bills and determine if the AMP Pilot is a good fit for them.
- Community partners who can help include: Catholic Charities, First State Community Action Agency, Stand By Me, Delaware Department of Health and Social Services, Division of State Service Centers, and The Latin American Community Center.

- If a customer is eligible, the community partner they work with will provide their customer information to Delmarva Power. Delmarva Power then confirms if the customer is eligible and enrolls them in the AMP Pilot. Customers will receive a notification from Delmarva Power once they have been successfully enrolled.
- As part of enrollment, a customer will be switched to budget billing, which automatically sets their monthly cost at a flat amount that won't fluctuate based on seasonal energy usage.
- A customer can opt out of the program by calling us at 1-800-375-7117 and notifying us that they do not wish to participate.

6. We worked with several respected community partners across the state to develop the AMP Pilot.

- We formed a Working Group along with Delaware Public Service Commission Staff, the Division of the Public Advocate, Catholic Charities, Delaware Department of Health and Social Services, Division of State Service Centers, Stand By Me, the Sustainable Energy Utility, First State Community Action Agency, and The Latin American Community Center.
- Together, we designed a program to provide the most benefits to the greatest number of customers, while also making sure we were reaching customers who would be the most interested in participating in the program.
- With help from community partners, we designed a program to help customers not only reduce or eliminate unpaid account balances, but also provide them with tools and resources to help manage their energy costs in the future.
- Our community partners will serve as the initial points of contact for the program, helping customers evaluate their energy bills and determining if the AMP Pilot is a good fit for them.

Vehicles

The below communications vehicles, including collateral materials and tactics, will be evaluated as ways to communicate and educate customers about the program and raise awareness in the communities that may benefit from the program.

1. *Brochure* – Create a brochure with high-level information that community partners can use as a conversation starter. The piece will have pictures, tables and icons, as well as key program information.
2. *Fact Sheet* – Develop an in-depth fact sheet that outlines program details, eligibility and timeline, and answers key questions. Community partners can use this second piece with customers, once the customer is interested and requests full program details.
3. *Webpage* – Create website content focused on the pilot program. Host the fact sheet and brochure, as well as contact information for community partners that can help customers get involved.
4. *Postcard* – Create a targeted mailing database of customers who would potentially be eligible for the program. The database would include Delmarva Power residential customers in Delaware with an active account status who have a past due balance and do not have an active medical certification on file with Delmarva Power. A targeted database would provide a more effective use of program resources and focus outreach on customers most likely to engage with the program. The postcard would be a 6x9 oversized piece highlighting the role of key community partners in the program and driving traffic to the website for more information.
5. *Social Media* – Post information linking back to the webpage about the pilot program. Consider targeted marketing to low-income customers in key residential areas. Provide social media content to community partners so they can promote on their social media channels.
6. *Call Center Talking Points* – Provide call center representatives with talking points about the program so they can help guide potentially eligible customers towards enrollment.
7. *Welcome Letter* – Write welcome letter that lays out requirements for remaining in program and benefits of completing the program.
8. *Bill Notices/Notifications* – Provide notices on bill regarding potential program eligibility and, for customers enrolled in the program, provide customer's status in the program, as well as amount of credits earned each month.
9. *Community / Grassroots Outreach* –

- a. Educate nonprofits, state agencies, elected officials, and other stakeholders and community partners on program benefits and goals so they can serve as ambassadors for the program in the communities they serve. Outreach could include direct emails and a kickoff meeting at Delmarva Power's Conference Center to announce the program and answer questions.
 - b. Include program materials in Customer Advocate outreach, such as event tabling.
10. *News Release* – Announce program launch through joint news release with community partners.
11. *Program Status Letters* – Draft letters for different scenarios: non-eligible, late payment, second reminder late payment, program removal, and program completion.

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Attachment B

TABLE OF CONTENTS (Continued)RIDERS (Continued)

		<u>Leaf Number</u>
"ANEM"	Aggregated Net Energy Metering Rider	105a
"DP"	Dynamic Pricing Rider (Peak Energy Savings Credit)	106
"NCR"	Negotiated Contract Rate	108
"ES"	Electric Supplier	110
"SOS"	Standard Offer Service	111
"HPS"	Hourly Priced Service	113
"SOSPIC/DCA"	Standard Offer Service Phase In Credit/ Deferred Cost Adjustment	115
"R-DLC"	Residential Direct Load Control Rider	117
"UFRC"	Utility Facility Relocation Charge	118
"R-AMP"	Residential - Arrearage Management Plan Pilot Program Rider	122

RIDER "R-AMP"
RESIDENTIAL - ARREARAGE MANAGEMENT PLAN PILOT PROGRAM RIDER

A. Purpose

The Arrearage Management Plan Residential Rider Pilot Program (the "AMP Pilot" or "AMP") is intended to provide qualifying Delmarva Delaware Electric Residential Customers with arrearage forgiveness with the goal of providing tools and incentives to help them: (1) reduce or eliminate existing arrearages; (2) bring their account current; (3) improve their payment on new bills; and (4) remain current in their utility payment obligations and avoid disconnection.

B. Applicability

This Rider is applicable to any Customer served under Service Classifications "R", "R Space Heating" and "R-TOU-ND." *The Rider is applicable to the portion of the Customer's base rate charges related to the delivery or distribution of electricity.

C. Program Eligibility

1. To qualify for this Rider, a Customer's gross income must be at or below 60% of the Delaware State median income. Whether or not the Customer meets the low income requirement will be determined by the various state agencies and non-profit organizations involved in qualifying Customers for assistance.
2. Once the Customer has been determined to meet the income requirements, Delmarva will determine whether the Customer meets the other eligibility requirements of the AMP Pilot. These requirements are as follows: (a) the Customer must have a minimum arrearage on their Delmarva Power account for Delmarva charges of \$500 ; (b) the cap on the total amount that will be forgiven through the AMP is \$6,000; (c) Customers with active medical certifications on file with the Company are not eligible for the AMP; (d) to the extent that the AMP is extended beyond the pilot, a Customer who participates in the AMP Pilot must wait seven years to become eligible to participate in another AMP; (e) a Customer disconnected for more than thirty (30) days due to nonpayment, is not eligible for the AMP; and (f) if the Company has determined that there is evidence of fraud associated with the Customer's account the Customer will not be eligible for the AMP. AMP Pilot participants will not be required to pay any part of their pre-AMP arrears as a condition of reconnection and enrollment in the AMP.

D. Enrollment

If the Customer meets all the eligibility requirements, they will be automatically enrolled in the AMP Pilot; however, the Customer can opt out by notifying Delmarva that they do not want to participate in the AMP Pilot.

E. Program Duration

The AMP Pilot duration will be a total of fifteen (15) months including a catch-up period of three (3) months which allows the customer to catch up on missed payments and still remain in the AMP Pilot.

RIDER "R-AMP"
RESIDENTIAL - ARREARAGE MANAGEMENT PLAN PILOT PROGRAM RIDER (continued)

F. Payment Plan

Customer monthly payment plans for new charges will be established in the form of a 12-month levelized plan (i.e. budget billing). All AMP Pilot participants will be placed on budget billing in accordance with the Company's procedure pertaining to budget billing.

G. Arrears Forgiveness

Each AMP Customer's arrearage will be recorded at the time of enrollment and set aside in a new "AMP plan" to be established and maintained in the Company's billing system. Arrearage forgiveness credits will be applied to the Customer's AMP plan in equal 1/12 increments, when the Customer pays their monthly utility bill for current usage, including any other charges pertaining to late payment fees, disconnect/reconnect fees, or related fees. AMP forgiveness will be applied consistent with Delmarva's current payment posting sequence. An AMP credit installment may be earned even if payment is received after the due date, so long as the current monthly amount due is paid within the fifteen (15) month period of the AMP. Any late payment charges will be applied and due in the Customer's following month's bill. Credits awarded under the AMP Pilot will not be revoked unless a payment is returned for insufficient funds.

H. Voluntary Termination

AMP Pilot Customers who voluntarily terminate their utility service will have their AMP cancelled if service is not transferred to another service location within the Company's service territory.

I. Collection Activity

Once enrolled in the AMP Pilot, Customers who fall behind on their post-enrollment monthly bills will become subject to normal utility collection policies, up to and including disconnection for nonpayment. Any Customers who experience disconnection for nonpayment may continue their AMP if they make the required payments, excluding any pre-enrollment arrearages, necessary to restore service within thirty (30) days of disconnection.

J. Involuntary Termination

After thirty (30) days of being disconnected for non-payment, the AMP would default, i.e., the Customer would be removed from the AMP, and all charges, including unpaid charges incurred during the AMP Pilot and any pre-program arrears that were not already forgiven, would become due.

Attachment C

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Leaf Number

SERVICE CLASSIFICATIONS

CORE SALES SERVICES

"RG"	Residential Gas Sales Service	40
"GG"	General Gas Sales Service	41
"GL"	Gas Lighting Sales Service	42
"MVG"	Medium Volume Gas Sales Service	43
"LVG"	Large Volume Gas Sales Service	46
"LVG-QFCP-RC"	Large Volume Gas Sales Service-Qualified Fuel Cell Provider-Renewable Capable Power Production	48a
"PM"	Peak Management Rider	49

CORE TRANSPORTATION SERVICES

	Transportation Terms and Conditions	51
"GVFT"	General Volume Firm Transportation Service	60
"MVFT"	Medium Volume Firm Transportation Service	61
"LVFT"	Large Volume Firm Transportation Service	62
"SBS"	Stand-By Gas Supply Service	63

NON-CORE SERVICES

"QFT"	Quasi-Firm Transportation Service	65
"MVIT"	Medium Volume Interruptible Gas Transportation Service	66
"LVIT"	Large Volume Interruptible Gas Transportation Service	68
"FPS"	Flexibly Priced Gas Supply Service	74
"NCR"	Negotiated Contract Rate Service	76

RIDERS

"ESR"	Environmental Surcharge Rider	79
"UFRC"	Utility Facility Relocation Charge	81
"R-AMP"	Residential - Arrearage Management Plan Pilot Program	94

RIDER "R-AMP"
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B. Applicability

This Rider is applicable to any Customer served under Service Classifications "RG." *The Rider is applicable to the portion of the Customer's base rate charges related to the delivery or distribution of gas.

C. Program Eligibility

1. To qualify for this Rider, a Customer's gross income must be at or below 60% of the Delaware State median income. Whether or not the Customer meets the low income requirement will be determined by the various state agencies and non-profit organizations involved in qualifying Customers for assistance.
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